

REMARKS

The independent claims of the application were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Bomers* in view of *Khoo*. See *Office Action*, 2. All of the dependent claims—with the exception of claims 3, 11, and 19—were also rejected under 35 U.S.C. § 103(a) per *Bomers* and *Khoo*. See *Office Action*, 2. Dependent claims 3, 11, and 19 were rejected per *Bomers* and *Khoo* in further in view of *Lareau et al.* See *Office Action*, 3. The Applicants respectfully traverses as more fully set forth below.

REJECTION OF THE INDEPENDENT CLAIMS

Bomers, *Khoo*, and *Lareau* (individually or in combination) fail to suggest or teach at least the following elements of (for example) independent claim 1:

- (a) converting the analog input to polar coordinates;
- (b) mapping the polar coordinates to a button for a second hand-held computing device; and
- (c) generating an event indicating a state of the button for the second hand-held computing device, wherein software executed on the second hand-held computing device may be compatibly executed on the first hand-held computing device

The prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP § 2143. Further, "there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings." *Id.*

As admitted by the Examiner, *Bomers* does not disclose the first and the second hand-held computing device. See *Office Action*, 2. The Examiner then contends that "*Khoo* teaches the first and the second hand-held computing device" and that "[i]t would have been obvious to one of ordinary skill in the art at the time of the invention to incorporate *Khoo* teachings into *Bomers* system in order to obtain compound portable device." *Office Action*, 2. The Applicants respectfully disagree.

Nowhere in *Bomers* is there teaching or a suggestion relating to converting analog input to polar coordinates, mapping the polar coordinates to a button for a second hand-held computing device and generating an event indicating a state of the button for the second hand-held computing device, wherein software executed on the second hand-held computing device may be compatibly executed on the first hand-held computing device. Further, *Khoo* does not teach or suggest that converting the analog input to polar coordinates, mapping the polar coordinates to a button for a second hand-held computing device generating an event indicating a state of the button for the second hand-held computing device, wherein software executed on the second hand-held computing device may be compatibly executed on the first hand-held computing device.

As set forth in claim 1, by mapping the analog input to buttons, software executed on previous hand-held computing devices may be compatibly executed current hand-held computing devices. This novel and non-obvious solution is wholly lacking in the cited art.

Further, while the Examiner contends that "*Lareau* teaches polar coordinates," the Applicants disagree with the related contention that "[i]t would have been obvious to one of ordinary skill in the art at the time of the invention to incorporate *Lareau* teachings into *Bomers* and *Khoo* system," especially with respect to the Examiner's contention that such motivation may be related to "track[ing] assets." *Office Action*, 3-4.

Lareau concerns the tracking of physical assets through the likes of RFID tags, which may further involve the use of the polar coordinates to represent the coordinate locations of the assets. The invention as set forth in claim 1, however, concerns the mapping of analog input in a first hand-held computing device and converting that input to state data for a second hand-held computing device using polar coordinates. Nowhere can information be found in *Lareau* relating to mapping of analog input in a first hand-held computing device and converting that input to state data for a second hand-held computing device using polar coordinates.

In light of these remarks, the Applicants believe that *Bomers*, *Khoo* and *Lareau* fail to disclose the claimed invention set forth in independent claim 1. Claims 9 and 17 recite similar elements and are allowable over the cited references for at least the same reasons.

REJECTION OF THE DEPENDENT CLAIMS

For the reasons as described above, the Applicants believe that claims 1, 9 and 17 are allowable over the cited references. Insofar as claims 2 and 4-8 depend from claim 1, including every claimed element thereof, they are also allowable on their own merits in claiming additional elements not found in claim 1. Similarly, since claims 10 and 12-16 depend from claim 9 and claims 18 and 20-24 depend from claim 17, including every claimed element thereof, they are also allowable on their own merits in claiming additional elements not found in claims 9 and 17 respectively. It is, therefore, the Applicant's belief that the claims 2, 4-8, 10, 12-16, 18, and 20-24 are also allowable over the cited art of record.

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CONCLUSION

The Applicants contend the presently pending claims are allowable over the cited art of record, which fails to disclose converting the analog input to polar coordinates; mapping the polar coordinates to a button for a second hand-held computing device; and generating an event indicating a state of the button for the second hand-held computing device, wherein software executed on the second hand-held computing device may be compatibly executed on the first hand-held computing device.

The Applicants further question the motivation to combine certain references, namely Lareau with Bomers and Khoo. The Applicants note that asset tracking per Lareau and software conversion as claimed are wholly disparate fields of use with no technical relationship that would cause one skilled in the art to bridge the gap between.

The Examiner is invited to contact the undersigned with any questions concerning the present response. Allowance is otherwise respectfully requested.

Respectfully submitted,
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